

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 1:19-cr-03113-JB

SERGIO VALDEZ,

Defendant.

**UNOPPOSED MOTION TO DISMISS PETITION
FOR REVOCATION OF SUPERVISED RELEASE**

Defendant, Sergio Valdez, through counsel, Law Office of Ryan D. Baughman, LLC, by Ryan D. Baughman, respectfully requests the Court enter an order dismissing the Petition for Revocation of Supervised Release “Petition” [Doc. 876] with prejudice.

1. On August 21, 2024, a Petition for Revocation of Supervised Release was filed, alleging Mr. Valdez violated the conditions of his Supervised Release by testing positive for controlled substances and deviating from his approved location monitoring schedule. *See* Petition [Doc. 876].

2. A Warrant was issued for Mr. Valdez, and he was taken into custody. He later appeared for his preliminary revocation and detention hearing on August 26, 2024. *See* Clerk’s Minutes [Doc. 885].

3. At the hearing, the Defendant waived his right to a preliminary hearing. *See* Waiver [Doc. 888]. The United States and the United States Probation Office did not recommend Detention and Mr. Valdez was placed on conditions of release. *See*, Order Setting Conditions of Release [Doc. 890]

4. On January 28, 2025, Defendant’s Final Revocation Hearing, scheduled for January 29, 2025, was vacated. *See* Minute Order [Doc. 940, Text Only Entry].

5. Due to the progress being made by the Defendant while he is on supervised release, United States Probation Officer, Charlotte Cde Baca, recommends that the Petition is dismissed and thus does not oppose this motion.

6. Defense counsel does not oppose this recommendation.

7. Assistant United States Attorney, Elaine Y. Ramirez, has further indicated no opposition to this motion.

WHEREFORE, Mr. Valdez respectfully requests the Court enter an order dismissing the Petition for Revocation of Supervised Release with prejudice, and for any such further relief the Court deems just and proper.

Respectfully submitted,

LAW OFFICE OF
RYAN D. BAUGHMAN, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the parties in this matter.

By: /s/ Ryan D. Baughman
Counsel for Defendant